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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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TERESA MORALES
Plaintiff,

vs.

CAROLYN COLVIN
COMMISSIONER OF SOCIAL
SECURITY

Defendant.

CIVIL ACTION NO. 2:16-cv-00230 JAD-NJK

**STIPULATION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S REPLY
TO DEFENDANT'S CROSS MOTION TO AFFIRM**

(First Request)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel, that the Plaintiff, TERESA MORALES, shall have an additional thirty (30) days, to and including Thursday, October 27, 2016 in which to file a **REPLY TO DEFENDANT'S CROSS MOTION TO AFFIRM** pursuant to this Court's Order Concerning Review of Social Security Cases, and that the schedule for briefing by the Defendant, Commissioner of Social Security, and other corresponding deadlines be adjusted accordingly.

The extension of time is necessary because Counsel, a solo practitioner and solely responsible for the preparation this Reply, has not been able to adequately brief this case in the allotted time. The administrative record is detailed, and involves complex issues requiring additional time to research. Counsel has also had an unprecedented number of

critical deadlines in other matters, and undersigned Counsel has not been able to meet all of these deadlines in a timely manner.

This is the first request for an extension of time.

Respectfully submitted,

Date: September 26, 2016

RICHARD E. DONALDSON, ESQ., CHTD.

/s/ Richard E. Donaldson
Richard E. Donaldson
Nevada Bar No. 1095
2300 West Sahara Ave., Suite 800
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Attorney for Plaintiff

Date: September 26, 2016

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney
Attorneys for Defendant

IT IS SO ORDERED.

Date: September 27, 2016


THE HONORABLE NANCY J. KOPPE
Magistrate Judge